

BEFORE THE ILLINOIS COMMERCE COMMISSION

DOCKET 01-0662

REPLY TESTIMONY OF TARA McCABE

ON BEHALF OF XO ILLINOIS, INC.

May 20, 2002

1 **REPLY TESTIMONY OF TARA MCCABE**

2
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6 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

7
8 **Q. Please state your name and business address.**

9
10 A. My name is Tara McCabe. My business address is 800 Jorie Boulevard, Oak
11 Brook, IL 60523.

12
13 **Q. Are you the same Tara McCabe who previously filed testimony in this**
14 **docket?**

15
16 A. Yes, I am.

17 **Q. What is the purpose of your testimony?**

18
19 A. The purpose of my testimony is to address the Rebuttal Testimony of Robben
20 Kniffen-Rusu.

21
22 **II. CHECKLIST ITEM 7: OS/DA DATABASES AND**
23 **CHECKLIST ITEM 8: WHITE PAGES**

24
25 **Q. In her rebuttal testimony at pages 2-3, Ms. Kniffen-Rusu infers that the**
26 **problems XO has experienced regarding directory listings have been caused**
27 **by XO. Do you agree with this assessment?**

28
29 A. No. While the specific problem, duplicate listings, addressed by Ms. Kniffen-
30 Rusu may have been attributable to XO in the first instance, had the process been
31 working as stated by Ms. Kniffen-Rusu , XO would have been made aware of its
32 error in December 2001 instead of March 28, 2002. The extent of the problem
33 would have been greatly reduced.

34
35 **Q. Please elaborate.**
36

1 A. As stated earlier, XO uses ACES to submit its directory listing orders. According
2 to the process outlined by Ms. Kniffen-Rusu in her rebuttal testimony at page 4,
3 XO should receive a CLEC Reject Notification form via fax when a problem such
4 as duplicate listings is detected. XO does not receive these notifications
5 according to the process. My direct testimony in this docket was filed on March
6 20. On March 28, we did receive a large number of CLEC Notification forms via
7 fax. This one-time mass notification apparently was sufficient rectification of the
8 problem for Ms. Kniffen-Ruse to claim in her April 22, 2002 testimony that AAS
9 staff has been retrained and the process is now working. Since receiving the mass
10 notification on March 28, XO has not received a single CLEC Reject Notification.
11 If the process is in fact now working, XO has sent its directory listing orders
12 perfectly for the past two months. If true, this is fantastic news for XO, but I
13 remain skeptical of whether Ameritech has properly implemented its CLEC
14 Reject Notification process on a going forward basis.

15
16 **Q. Do have any other concerns about this process?**

17
18 A. Yes. Ms. Kniffen-Rusu states that AAS processes 90% of XO's directory listing
19 orders electronically. She states that this figure shows the problem is not
20 significant. To the contrary, manually processing 10% of our orders – orders that
21 are sent correctly by XO - is too high and indicates that there is in fact a problem.
22 As Ms. Kniffen-Rusu states, it is these orders where the potential for error exists.

23
24 **Q. How has Ameritech characterized its process?**

25

1 A. Apparently, AAS is down playing the inefficiencies of ACES, stating that it is
2 meant to be a “transitional tool”. To my knowledge, XO has been using ACES
3 for the past four years. We were never told that this was a “transitional tool”.
4 This raises great concerns regarding how AAS handles their wholesale customers
5 and calls into question whether our Ameritech Account Team is truly looking out
6 for the best interest of their customers from an operational perspective.

7
8 **Q. AAS states that the Listing Trouble Report (LTR) can be used for all**
9 **problems or discrepancies. Has this been your experience?**

10
11 A. No, and it is contrary to the information I am given by the AAS representatives
12 that I interact with. According to what I have been told by AAS, the ACES
13 confirmation is not proof that the order correctly transmitted into to the White
14 Page Database. It is simply confirmation that the order entry into ACES was
15 correct. When we find that a listing is missing or incorrect, we are told by the
16 AAS representatives who process the orders to submit an LTR to the trouble
17 resolution group. When we submit the LTR to the trouble resolution group, we
18 are told that they cannot help us unless there is an order entered into the White
19 Page Database and we are instructed to resubmit the order. If the solution is
20 resubmitting the order, the LTR is no solution at all. Ms. Kniffen-Rusu refers to
21 the CLEC Online Handbook and its instructions for the LTR process. It is fine for
22 Ameritech to refer to a company resource. However, it has been XO’s experience
23 that Ameritech personnel do not follow the process as outlined in the CLEC
24 Online Handbook .

25

1 **Q. AAS states that XO representatives have been trained on three occasions**
2 **since September 2001. Have you received training?**

3
4 A. I originally had primary responsibility for directory listings orders, and I never
5 received training during that time. I am unaware of any other XO employees who
6 received training.

7
8 **Q. On page 7 of her Rebuttal Testimony Ms. Kniffen-Rusu, states that**
9 **TCListLink “allows CLECs to review and verify their end-user’s WP listing**
10 **data.” Do you agree?**

11
12 A. Ms. Kniffen-Rusu’s statement is only partially correct. In most instances, XO can
13 view the listings for its customer using TCListLink. Access, however, is limited
14 to the telephone numbers served by XO. Therefore, if a customer migrates only
15 part of its service from another carrier to XO, XO can only “see” the telephone
16 numbers it serves. This raises problems when the previous carrier does not delete
17 its listing of these numbers. Using TCListLink, XO can confirm that the listings
18 it is responsible for are correct. However, there may be listings under another
19 carrier’s name that XO cannot see. The White Page Directory, when printed, will
20 contain all the information in the database, which may not be consistent with what
21 the customer wants.

22
23 **Q. You said in most instances XO can see its listing. When would it not be able**
24 **to?**

25
26 A. We recently migrated a large customer from Ameritech who had multiple
27 locations and multiple remote call forwarded numbers, so that its customers could
28 make a call locally and reach the main service address that may not be within the
29 caller’s local calling area. When the customer was with Ameritech, the customer

1 had only its main service address listed in the White Page Directory, but each
2 local phone number was listed by community name and the corresponding local
3 number. Additionally, the customer's information in the Directory Assistance
4 Database, which feeds the information to the caller when 411 is dialed, needs to
5 track of the customer's listings. The customer wanted to retain this set-up when
6 migrating to XO.

7
8 In order to accomplish this, the information in the White Page database had to be
9 different then what is in the Directory Assistance Database. Since TCListLink is
10 updated by the White Page Database, we are able to see the White Page Listing
11 information but not the Directory Assistance Listing information. So, in this
12 scenario, the two databases would not match.

13

14 Certainly this is an unusual situation, but it is just as important that the customer
15 is able to have listing information the way it wants it.

16

17 **Q. Are there accuracy problems related to TCListLink which are not related to**
18 **the ordering process?**

19

20 A. Yes. We have had customer listings "fall out" of the TCListLink database. For
21 example, on October 9, 2001, I confirmed the listing information for a large
22 customer. There were approximately 16 listings for this customer. On April 30,
23 2002, we again checked this customer's listings in TCListLink and there were
24 only 6 listings.

25

1 XO did not process any listing change orders during the interim period. Further,
2 there was no way of knowing which listings fell out because TCListLink does not
3 retain a history of the listings. I had to retrieve the original order and resubmit the
4 missing listings. Attached hereto as Exhibit 1 is a confidential exhibit of the
5 TCListLink printouts.

6

7 AAS did not have an explanation for why this had happened.

8

9 **Q. What was the effect of Ameritech's unexplained error?**

10

11 A. Our customer's listings are an integral part of their businesses. This particular
12 customer lost 10 of its 16 listings in TCListLink. Such an error obviously
13 negatively impacts the customer's ability to run its business. From XO's
14 perspective, the added effect is that our customer mistakenly blames XO for
15 Ameritech's mistake.

16

17 **Q. Ms. Kniffen-Rusu states in her rebuttal testimony at page 11 that CLECs are**
18 **given two additional opportunities to verify their customer listing**
19 **information in the pre-BOC verification reports. Does this give you the**
20 **"ample opportunity" to verify customer listings that Ms. Kniffen-Rusu**
21 **attests to?**

22

23 A. It does give us another opportunity, but I certainly would not describe it as an
24 "ample opportunity". The report is a document about three inches thick, set in
25 small type. In order to "verify" each listing, we would need to pull each service
26 order and every modification order, if any, associated with each customer. This is
27 very labor intensive and impracticable. We do check the customer listings that

1 have had chronic problems, but we simply cannot go through one by one and
2 compare each to our original service order.

3
4 **Q. Can't you just check TCListLink?**

5
6 A. No, because, as stated earlier, sometimes the listing information changes within
7 TCListLink and we would not be able to tell that the listing was incorrect unless
8 we pulled the original service order. Additionally, it would be almost equally
9 labor intensive to look up each customer in TCListLink.

10
11 It is of the utmost importance that our listing information is transmitted correctly,
12 is received correctly, and is retained in the databases correctly. We should be able
13 to rely on the confirmation from ACES that the listing is as we sent it and is
14 correct.

15
16 **Q. What about training? Ms. Kniffen-Rusu seems to imply that XO has**
17 **received training numerous times, and still does not seem to get it?**

18
19 A. I would like to point out that according to Ms. Kniffen-Rusu, XO has not received
20 formal training in almost three years. She states that AAS provided refresher
21 videos to two different XO offices. XO directory listing functions for the
22 Ameritech region are part of the Service Delivery center in Oak Brook, IL. I have
23 no idea who would have received these videos. The Oak Brook center is the only
24 facility with directory listing responsibilities. I have checked with each of the
25 managers of our markets and have not been able to identify any one who has
26 received these videos.

27

1 **Q. What about the on-going support via the CLEC Hotline?**

2

3 A. We do utilize the Hotline. However, I would not characterize it as training.

4 Generally, we are told to leave a message and our call will be returned. More

5 times than not, we are simply told to open an LTR. I have already discussed our

6 problems related to the LTR process and will not re-hash them here.

7

8 At one point, we were given about two days notice of a training session, but were

9 unable to redistribute work loads on such short notice in order to be able to attend.

10

11 **Q. Does this conclude your direct testimony?**

12

13 A. Yes it does.

14

15

16